

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

In Re: Maria Del Carmen Ramos)
) Case No.: 16-14859
)
 Debtor) Chapter: 13

RESPONSE TO THE TRUSTEE'S MOTION TO DISMISS THE CASE

Debtor, Maria Del Carmen Ramos, by and through her counsel, William P. Marshall, Esquire avers as follows in opposition to the Trustee's Motion to Dismiss the Case:

On May 25, 2017, Debtor, Maria Del Carmen Ramos filed an amended Chapter 13 Plan. The amended Plan increased the amount of the monthly payment to the Trustee from \$250.00 per month to \$625.00 beginning in June 2017. Debtor misunderstood what counsel advised her and continued to make a \$250.00 payment in June and July 2017.

Subsequently, following a discussion with the Trustee's counsel, Debtor amended her Plan again on August 16, 2017 to provide for large lump sum payments into the Plan based on the Debtor's Federal Income Tax return history, and counsel for the Debtor identified the payment in the manner in which the counsel for the Trustee had requested. This amended Plan calls for the Debtor to make monthly payments in the amount of \$500.00 beginning in August 2017. Debtor has in fact made two such Plan payments to the Trustee, and she is current as it relates to the payment schedule set forth therein. As such, it is respectfully submitted that the Debtor's Chapter 13 Petition should not be dismissed.

WHEREFORE, it is respectfully requested that this Honorable Court deny the Trustee's Motion to Dismiss the aforesaid Chapter 13 Bankruptcy Petition.

Respectfully submitted:

By:

William P. Marshall
WILLIAM P. MARSHALL, ESQUIRE
Attorney for Debtor,
Maria Del Carmen Ramos